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Irving, TX 75039
Jeffrey E. Cook, Attorney at Law

Invoice submitted to:
Mike Ferguson - via email

March 17, 2022

In Reference To: ***Frazier Asset Management, Inc. v. Anson Financial, Inc.***

Professional Services

		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
11/9/2016	JA	Reviewed correspondence from C. Moore regarding acceptance of service of new lawsuit against M. Ferguson; correspondence to M. Ferguson regarding same.	350.00/hr 0.20	70.00
	JEC	Receive and review email correspondence from Caleb Moore regarding Frazier Asset Mgmt. Inc. lawsuit.	400.00/hr 0.10	40.00
	JEC	Receive and review email correspondence from client regarding service of new lawsuit.	400.00/hr 0.10	40.00
	JEC	Receive and review email correspondence from client regarding have him served on new lawsuit; Brian's company not in good standing.	400.00/hr 0.10	40.00
11/10/2016	JEC	Receive and review email correspondence from client regarding dropbox link for Alvord 287; Alvord 287 Joint Venture; Anson Financial; Alvord 287 JV - 2016 FAM check; Alvord 287/Frazier Asset Management.	400.00/hr 0.60	240.00
11/16/2016	JA	Reviewed certificate of formation regarding Frazier Asset Management and discussed strategy with M. Ferguson.	350.00/hr 0.30	105.00
	JEC	Receive and review email correspondence from client regarding the owner of Frazier Asset Management, Inc., a Texas Corporation.	400.00/hr 0.10	40.00
	JEC	Receive and review email correspondence from client regarding served with lawsuit by Frazier Asset Management, Inc.	400.00/hr 0.10	40.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
11/16/2016	JEC	Receive and review email correspondence from client regarding offer to pay Brian Frazier for Joint Venture.	400.00/hr 0.10	40.00
11/22/2016	JA	Reviewed correspondence from M. Ferguson regarding distributions to Frazier.	350.00/hr 0.10	35.00
	JEC	Receive and review email correspondence from client regarding paying Frazier Asset Management, Inc. \$19,000.	400.00/hr 0.10	40.00
12/8/2016	JA	Review pertinent documents; Telephone conference with M. Ferguson regarding various legal issues; legal research regarding standing, capacity, corporate status termination; drafted Defendant's Original Answer and associated verification; drafted Motion for Summary Judgment; drafted Plea in Abatement; correspondence to M. Ferguson regarding forwarding answer and plea in abatement documents.	350.00/hr 5.50	1,925.00
	JEC	Review proposed response, motion to dismiss and affidavit of client; telephone conference regarding hearing.	400.00/hr 0.90	360.00
12/9/2016	JA	Revised Plea in Abatement to request abatement as alternative to dismissal; exchanged correspondence with M. Ferguson regarding plea in abatement; reviewed documents from Secretary of State and finalized answer and plea in abatement filing.	350.00/hr 0.80	280.00
	JEC	Receive and review email correspondence from client regarding Original Answer, verification and Plea in Abatement.	400.00/hr 0.10	40.00
12/12/2016	JA	Reviewed authority cited in Plea in Abatement; Telephone conference with C. Moore regarding conference on Plea in Abatement; filed Answer and Plea in Abatement.	350.00/hr 0.90	315.00
12/14/2016	SD	Communication with Court Coordinator regarding hearing of Plea for Abatement; Prepare communication to counsel regarding hearing and eserve/efile same.	125.00/hr 0.70	87.50
1/9/2017	JA	Reviewed correspondence from C. Moore regarding Secretary of State reinstatement that purportedly resolves corporate standing issue for Frazier Asset Management; reviewed correspondence from M. Ferguson regarding reinstatement not resolving the standing issue for Frazier.	350.00/hr 0.30	105.00
	JEC	Receive and review email correspondence from client regarding B. Frazier Management, Inc. is not Frazier Asset Management, Inc.	400.00/hr 0.10	40.00
1/10/2017	JA	Reviewed Secretary of State online records regarding reinstatement of Frazier entity; correspondence to M. Ferguson regarding effect of reinstatement and Frazier's request for	350.00/hr 0.40	140.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
	accounting; reviewed correspondence from M. Ferguson regarding provision of accounting to Frazier.			
1/11/2017	JA Telephone call to M. Ferguson regarding strategy.	350.00/hr	0.20	70.00
1/17/2017	JA Reviewed correspondence from C. Moore regarding Plea in Abatement.	350.00/hr	0.10	35.00
1/19/2017	JA Reviewed Plea in Abatement and responded to C. Moore regarding statutory support for extinguishment of claims.	350.00/hr	0.30	105.00
1/20/2017	JA Reviewed Joint Venture Agreement; began revising MSJ; Telephone conference with M. Ferguson regarding litigation strategy.	350.00/hr	1.00	350.00
1/24/2017	JA Continued drafting Motion for Summary Judgment; correspondence to M. Ferguson regarding forwarding draft Motion for Summary Judgment.	350.00/hr	2.80	980.00
1/25/2017	SD Communication with Court regarding hearing on motion for summary judgment.	125.00/hr	0.40	50.00
	JA Telephone conference with C. Moore regarding status of case, including conference on MSJ; Conference regarding court's ability to set MSJ for hearing in February; Receive and review correspondence from C. Moore regarding status of Plaintiff's amended petition.	350.00/hr	0.50	175.00
1/26/2017	JA Telephone conference with M. Ferguson regarding status and strategy.	350.00/hr	0.50	175.00
2/3/2017	SD Communication with court regarding hearing on Defendants plea in abatement; Prepare correspondence to counsel and court regarding removal of hearing on Defendants plea in abatement.	125.00/hr	0.60	75.00
2/7/2017	JA Reviewed Plaintiff's First Amended Petition and forwarded same to M. Ferguson; Telephone conference with M. Ferguson regarding amended petition.	350.00/hr	0.60	210.00
2/8/2017	SD Assist attorney in reviewing the Original Petition and First Amended Petitions regarding additions to the First Amended for attorney review.	125.00/hr	0.60	75.00
2/20/2017	JEC Receive and review correspondence from the Court regarding Trial Date set for January 16, 2018.	400.00/hr	0.10	40.00
2/21/2017	JA Reviewed court's trial setting order and forwarded same to M. Ferguson.	350.00/hr	0.10	35.00

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			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
3/8/2017	JA	Reviewed Plaintiff's payment of jury fee and request for jury trial; correspondence to M. Ferguson forwarding same.	350.00/hr	0.10	35.00
	JEC	Receive and review correspondence from Caleb Moore regarding payment of jury fee.	400.00/hr	0.10	40.00
3/20/2017	JA	Telephone conference with M. Ferguson regarding status and scheduling.	350.00/hr	0.20	70.00
3/21/2017	JA	Reviewed file regarding status; correspondence to C. Moore regarding requesting date for B. Frazier's deposition; Conference regarding payments to registry of the court; correspondence to M. Ferguson regarding payments to registry of the court and doc production; reviewed discovery requests from C. Moore and forwarded same to M. Ferguson.	350.00/hr	0.70	245.00
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
3/22/2017	JA	Telephone call to M. Ferguson regarding status of financial update; Telephone call from M. Ferguson regarding document production; reviewed documents on dropbox as produced by M. Ferguson.	350.00/hr	0.90	315.00
	JEC	Receive and review email correspondence from client.	400.00/hr	0.20	80.00
3/23/2017	JA	Revised correspondence to C. Moore regarding deposition dates to include production of flash drive; Telephone conference with M. Ferguson regarding document production; revised correspondence and forwarded flash drive to C. Moore.	350.00/hr	0.40	140.00
3/30/2017	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
4/3/2017	JA	Telephone conference with C. Moore regarding document production and deposition scheduling.	350.00/hr	0.20	70.00
4/4/2017	JA	Reviewed correspondence from court clerk regarding new trial setting date; correspondence to M. Ferguson regarding forwarding same.	350.00/hr	0.10	35.00
4/6/2017	JA	Reviewed correspondence from C. Moore regarding deposition dates for Frazier as well as status of doc production; forwarded same to M. Ferguson.	350.00/hr	0.10	35.00
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
4/12/2017	JA	Telephone conference with M. Ferguson regarding status.	350.00/hr	0.20	70.00
4/18/2017	JA	Drafted response to Request for Disclosure, objections and responses to interrogatories and Request for Production; drafted correspondence to C. Moore regarding document	350.00/hr	2.60	910.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
	production; correspondence to M. Ferguson regarding forwarding drafts for review and discussion.			
4/18/2017	JEC Receive and review email correspondence from client.	400.00/hr	0.10	40.00
4/19/2017	JA Reviewed correspondence from M. Ferguson regarding discovery; Telephone conference with M. Ferguson regarding discovery responses and correspondence to C. Moore; revised discovery responses and forwarded to M. Ferguson for review.	350.00/hr	2.30	805.00
4/20/2017	JA Telephone conference with M. Ferguson regarding review and revision of discovery responses and correspondence to C. Moore regarding document production and deposition scheduling; finalized and filed discovery responses; revised correspondence to C. Moore and forwarded same; reviewed spreadsheet from M. Ferguson regarding distribution and profit summaries.	350.00/hr	3.20	1,120.00
	JEC Receive and review email correspondence from client.	400.00/hr	0.10	40.00
4/24/2017	JA Reviewed correspondence from C. Moore regarding discovery dispute; correspondence to M. Ferguson regarding same; reviewed M. Ferguson's response to C. Moore's letter.	350.00/hr	0.30	105.00
	JEC Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
	JEC Receive and review email correspondence from client.	400.00/hr	0.10	40.00
4/25/2017	JA Telephone conference with M. Ferguson regarding response to C. Moore's discovery dispute letter.	350.00/hr	0.50	175.00
	JEC Receive and review email correspondence from client.	400.00/hr	0.10	40.00
4/26/2017	JA Reviewed correspondence and attachments forwarded by M. Ferguson and prepared draft response to C. Moore responding to specific discovery dispute items; forwarded draft correspondence to M. Ferguson for review.	350.00/hr	1.80	630.00
	JEC Receive and review email correspondence from client.	400.00/hr	0.10	40.00
4/27/2017	JA Reviewed M. Ferguson's revised correspondence to C. Moore and made additional edits; reviewed correspondence from M. Ferguson regarding additional revisions and finalized letter; Telephone conference with M. Ferguson regarding finalization of letter response to C. Moore.	350.00/hr	1.00	350.00
	JEC Receive and review email correspondence from client.	400.00/hr	0.30	120.00
4/28/2017	JA Finalized letter response with exhibits to C. Moore regarding document production.	350.00/hr	0.50	175.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
5/1/2017	JA Telephone call to C. Moore regarding deposition scheduling and document production; Telephone call to M. Ferguson regarding same; correspondence to C. Moore regarding forwarding Dropbox link and requesting deposition dates; Telephone call from M. Ferguson regarding production of checks received; reviewed correspondence from M Ferguson regarding providing pay history and supporting documents.	350.00/hr	0.90	315.00
5/2/2017	JA Reviewed correspondence from C. Moore regarding continued dispute as to bank statements; correspondence to M. Ferguson regarding forwarding C. Moore's correspondence and need for response; reviewed correspondence from C. Moore regarding available deposition date; drafted Request for Disclosure to Plaintiffs; began drafting interrogatories and Request for Production to Plaintiffs; Telephone conference with M. Ferguson regarding strategy.	350.00/hr	2.20	770.00
	JEC Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
5/3/2017	JA Reviewed correspondence from M. Ferguson regarding production of bank statements; completed drafting interrogatories and Request for Production to Plaintiffs and reviewed same with M. Ferguson via phone conference; served discovery on C. Moore.	350.00/hr	3.40	1,190.00
5/15/2017	AB Review and revise objections to motion for summary judgment; review and revise special exceptions; review and revise response to motion for summary judgment.	350.00/hr	3.60	1,260.00
5/17/2017	JA Exchanged correspondence with C. Moore's office confirming postponement of B. Frazier deposition and requested potential dates for deposition in June.	350.00/hr	0.20	70.00
5/18/2017	JA Reviewed correspondence from M. Ferguson regarding Frazier not being on Leesok bank statements.	350.00/hr	0.10	35.00
	JEC Receive and review email correspondence from client.	400.00/hr	0.10	40.00
5/19/2017	JA Reviewed correspondence from C. Moore regarding continued unwarranted requests for bank statements; Telephone conference with M. Ferguson regarding same.	350.00/hr	0.30	105.00
5/20/2017	JA Correspondence to C. Moore regarding request for production of alleged bounced check.	350.00/hr	0.10	35.00
5/25/2017	JA Receive and review correspondence from C. Moore regarding discovery extension; responded to C. Moore granting extension; correspondence to C. Moore following-up request for bounced check.	350.00/hr	0.10	35.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
5/26/2017	JA	Receive and review correspondence from C. Moore regarding status of production of bounced check; forwarded same to M. Ferguson.	350.00/hr 0.10	35.00
6/5/2017	JA	Telephone call to court coordinator regarding obtaining hearing date on Motion for Summary Judgment; correspondence to C. Moore regarding advising of hearing date.	350.00/hr 0.40	140.00
6/9/2017	JA	Reviewed discovery responses forwarded by C. Mooore and forwarded same to M. Ferguson.	350.00/hr 0.40	140.00
6/22/2017	JA	Correspondence to M. Ferguson regarding Frazier's continued request for bank statements; Receive and review correspondence from M. Ferguson regarding location of checks on the shared folder; Receive and review correspondence from T. Moore regarding request for bank statements.	350.00/hr 0.40	140.00
7/25/2017	JA	Reviewed file regarding Motion for Summary Judgment hearing next week.	350.00/hr 0.20	70.00
7/27/2017	JA	Reviewed Frazier's Response to Motion for Summary Judgment and forwarded same to M. Ferguson; Telephone conference with M. Ferguson regarding Frazier Response.	350.00/hr 1.20	420.00
7/28/2017	JA	Telephone call to court coordinator regarding canceling Motion for Summary Judgment hearing; correspondence to C. Moore regarding cancellation of MSJ hearing; correspondence to C. Moore regarding document production and deposition dates.	350.00/hr 0.50	175.00
7/31/2017	JA	Telephone conference with C. Moore regarding status of settlement discussions; Telephone conference with M. Ferguson regarding status and additional information; Telephone conference with C. Moore regarding background information.	350.00/hr 1.00	350.00
8/4/2017	JA	Receive and review correspondence from C. Moore regarding bank account and registry of court issues; forwarded correspondence to M. Ferguson; reviewed M. Ferguson's response to Frazier's request.	350.00/hr 0.20	70.00
8/28/2019	JA	Conference regarding file status; reviewed scheduling order; reviewed Court's Order Granting Substitution of Counsel; reviewed correspondence from C. Moore regarding request for continuance.	350.00/hr 0.30	105.00
8/29/2019	JA	Reviewed correspondence from M. Ferguson regarding requested continuance.	350.00/hr 0.10	35.00
8/30/2019	JA	Receive and review Order of Substitution of Counsel; Conference regarding requested continuance, including status of audit and discovery.	350.00/hr 0.50	175.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
9/3/2019	JA Telephone conference with M. Ferguson re: trial setting continuance and discovery stay; Telephone conference with C. Moore regarding continuance, audit, liability, and damages; Telephone conference with M. Ferguson regarding strategy.	350.00/hr	2.60	910.00
9/5/2019	JA Reviewed and revised draft Joint Motion for Continuance and proposed Order of Continuance; brief conference with M. Ferguson; correspondence to C. Moore regarding continuance.	350.00/hr	0.40	140.00
9/6/2019	JA Receive and review filed Motion for Continuance; exchanged multiple correspondence with court and all counsel re: hearing availability; reviewed M. Ferguson's correspondence to Kyle Hendrick.	350.00/hr	0.40	140.00
9/9/2019	JA Reviewed correspondence from M. Ferguson to K. Hendrick regarding clarification; reviewed Notice of Hearing on Joint motion for continuance.	350.00/hr	0.20	70.00
9/11/2019	JA Reviewed correspondence from K. Hendricks regarding accountant response to M. Ferguson; Telephone conference with M. Ferguson regarding same and hearing preparation; reviewed court's detailed pre-trial order and calendared pretrial filing deadlines.	350.00/hr	0.70	245.00
9/16/2019	JA Reviewed Frazier's motion to compel and for sanctions; reviewed draft correspondence from M. Ferguson; Telephone conference with M. Ferguson regarding motion to compel and response; Receive and review correspondence from M. Ferguson to CPA; reviewed correspondence from court coordinator regarding hearing on Motion to Compel; Telephone conference with M. Ferguson regarding preparation for hearing.	350.00/hr	2.30	805.00
9/17/2019	JA Substantial prep for motion to compel hearing and trial; drafted Defendant's Response to Motion to Compel.	350.00/hr	11.50	4,025.00
9/18/2019	JA Prepare for hearing; draft proposed form of order; travel to and attend hearing on Plaintiffs' Motion to Compel and Sanctions/Joint Motion for Continuance; reviewed Plaintiff's live pleading; Research regarding fiduciary duties; reviewed additional argument and materials provided by M. Ferguson.	350.00/hr	8.60	3,010.00
9/19/2019	JA Multiple telephone conferences with M. Ferguson regarding documents.	350.00/hr	0.80	280.00
9/20/2019	JA Receive and review exchange of correspondence from Kyle Hendrick and M. Ferguson regarding AUP moving forward; multiple conference regarding baseline agreements; reviewed exchange of correspondence between T. Castenada and M. Ferguson regarding comprehensive review of HUDs.	350.00/hr	0.80	280.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
9/23/2019	JA Reviewed multiple correspondences from C. Moore re: amendments to AUP and scheduling meeting for review; Telephone conference with M. Ferguson regarding status and strategy.	350.00/hr	0.50	175.00
9/24/2019	JA Reviewed correspondence from C. Moore regarding status; reviewed and revised draft correspondence to C. Moore re: next steps to complete AUP; Telephone conference with M. Ferguson regarding data review; additional correspondence to C. Moore re: data review and meeting with auditor; additional exchange of correspondence with C. Moore; correspondence to K. Hendrick regarding need for confirmation of plan to completion.	350.00/hr	2.10	735.00
9/25/2019	JA Reviewed multiple correspondences from K. Hendrick re: AUP suggestions and process review; reviewed correspondence from C. Moore re: review process; reviewed correspondence from M. Ferguson re: forwarding document links to C. Moore; Telephone conference with M. Ferguson re: audit status; Telephone conference with C. Moore re: status; Telephone conference with M. Ferguson re: strategy; review of pleadings, conference, and research re: FAM's lack of standing; research re: tax forfeiture; drafted correspondence to C. Moore re: confirming spreadsheet to HUDs to move forward with AUP	350.00/hr	3.80	1,330.00
	AB Conference regarding standing issues; legal research regarding standing.	350.00/hr	1.00	350.00
9/26/2019	JA Telephone conference with M. Ferguson regarding correspondence to C. Moore and forwarded same to C. Moore; reviewed additional correspondence from C. Moore and M. Ferguson regarding AUP process; Telephone conference with C. Moore regarding same; correspondence to K. Hendrick regarding confirming meeting in the morning; reviewed multiple correspondence regarding completing AUP; multiple telephone conferences with K. Hendrick, C. Moore, and M. Ferguson regarding agreements relative to AUP; reviewed correspondence from C. Moore agreeing to M. Ferguson's numbers; reviewed correspondence from M. Ferguson regarding Frazier's collection of fees from closings.	350.00/hr	3.90	1,365.00
9/30/2019	JA Reviewed correspondence from C. Moore regarding status; Telephone conference with M. Ferguson regarding same.	350.00/hr	0.20	70.00
10/1/2019	JA Reviewed and revised correspondence from M. Ferguson to C. Moore re: AUP agreements and review of items, including extended telephone conference with M. Ferguson regarding same.	350.00/hr	1.40	490.00
10/2/2019	JA Drafted correspondence to C. Moore re: spreadsheets for AUP; multiple telephone conferences with M. Ferguson regarding same; Telephone conference with C. Moore regarding AUP	350.00/hr	2.70	945.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
	review; Telephone conference with M. Ferguson and correspondence to K. Hendrick regarding status of agreements regarding AUP; reviewed correspondence from C. Moore to K. Hendrick regarding review process; correspondence to K. Hendrick forwarding attachments from earlier correspondence to C. Moore; Telephone call from M. Ferguson regarding status.			
10/3/2019 JA	Receive and review correspondence from C. Moore to K. Hendrick and correspondence from M. Ferguson in response; Telephone conference with K. Hendrick regarding moving forward; Telephone conference with M. Ferguson regarding AUP; drafted correspondence to K. Hendrick regarding need to complete AUP.	350.00/hr	1.90	665.00
10/4/2019 JA	Finalized and forwarded correspondence to K. Hendrick regarding completion of AUP; reviewed correspondence from C. Moore regarding AUP; reviewed correspondence from K. Hendrick regarding AUP letter.	350.00/hr	0.80	280.00
10/7/2019 JA	Telephone conference with M. Ferguson regarding dismissal strategy; reviewed M. Ferguson's correspondence to K. Hendrick proposing finalization of the AUP; reviewed K. Hendrick's correspondence regarding termination of AUP agreement; reviewed K. Hendrick's correspondence to court re: termination of AUP agreement and non-production of report; Telephone conference with M. Ferguson regarding termination of AUP; began drafting Plea to the Jurisdiction.	350.00/hr	2.60	910.00
10/8/2019 JA	Reviewed correspondence from C. Moore to CPA regarding AUP and court order; Continued researching, discussing, and drafting Plea in Abatement.	350.00/hr	9.00	3,150.00
10/9/2019 JA	Reviewed M. Ferguson's edits to Plea to Jurisdiction; finalized and filed plea; Telephone conference with M. Ferguson regarding plea to jurisdiction; reviewed K. Hendrick's correspondence to C. Moore regarding status; drafted order granting plea to the jurisdiction.	350.00/hr	2.60	910.00
10/10/2019 JA	Exchanged multiple correspondence with court coordinator and counsel regarding scheduling of hearing on AUP.	350.00/hr	0.10	35.00
10/11/2019 JA	Telephone conference with M. Ferguson regarding hearing settings and strategy; brief Telephone call to court coordinator regarding effort to schedule Plea to Jurisdiction for hearing.	350.00/hr	0.20	70.00
10/14/2019 JA	Two telephone conferences with court coordinator re: scheduling hearing on Plea to Jurisdiction; Telephone conference with M. Ferguson re: hearings on auditor issue and plea to jurisdiction; drafted Notice of Hearing on Plea to Jurisdiction.	350.00/hr	0.60	210.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
10/15/2019	JA Telephone conference with M. Ferguson regarding hearing on AUP.	350.00/hr	0.20	70.00
10/22/2019	JA Communicated with court coordinator re: rescheduling hearing time.	350.00/hr	0.00	NO CHARGE
10/24/2019	JA Worked on prep for hearing on AUP, including briefing and conversations with M. Ferguson.	350.00/hr	2.00	700.00
10/25/2019	JA Travel to and attend hearing regarding AUP.	350.00/hr	4.50	1,575.00
10/30/2019	JA Telephone conference with M. Ferguson regarding cessation of bus service because of road condition; Reviewed exchange of communications with auditor.	350.00/hr	0.40	140.00
11/4/2019	JA Status conference with M. Ferguson; reviewed research summary regarding plea to jurisdiction.	350.00/hr	0.20	70.00
11/5/2019	JA Multiple exchange of communication re: rescheduling hearing.	350.00/hr	0.20	70.00
11/6/2019	JA Reviewed Plaintiff's Response to Plea to Jurisdiction; reviewed Wallace opinion; multiple exchanges re: rescheduling hearing on plea to jurisdiction; research re: tax forfeiture; worked on draft of Reply Brief.	350.00/hr	5.70	1,995.00
11/7/2019	JA Drafted amended notice of hearing; Conference with M. Ferguson regarding Reply and hearing date; continued working on Reply Brief.	350.00/hr	1.80	630.00
11/8/2019	JA Reviewed Plaintiffs' Motion to Compel Production of bank records.	350.00/hr	0.20	70.00
11/11/2019	JA Reviewed correspondence regarding Notice of Hearing re: Motion to Compel bank records; reviewed actual notice of hearing on motion to compel; reviewed Plaintiffs' proposed orders on MTC, protective order, and plea to jurisdiction.	350.00/hr	0.20	70.00
11/12/2019	JA Telephone conference with M. Ferguson re: hearing.	350.00/hr	0.00	NO CHARGE
11/13/2019	JA Completed draft of Reply in Support of Plea to Jurisdiction.	350.00/hr	6.70	2,345.00
	AB Review plea to the jurisdiction; conference regarding same.	350.00/hr	0.50	175.00
11/14/2019	JA Exchanged correspondence with court re: rescheduling hearing; prepared for hearing on plea to jurisdiction, including preparation of BOC partnership rules flow chart.	350.00/hr	1.60	560.00
11/15/2019	JA Attended hearing on Plea to the Jurisdiction; reviewed court's order denying plea to jurisdiction; reviewed correspondence from C. Moore re: suggested bank records inspection process;	350.00/hr	3.20	1,120.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
	reviewed prior discovery supplementation; Telephone conference with M. Ferguson re: status			
11/16/2019 JA	Met with M. Ferguson re: litigation strategy and 30 day trial supplementation.	350.00/hr	2.50	875.00
11/17/2019 JA	Reviewed scheduling order and Rule 11 agreement re: experts.	350.00/hr	0.10	35.00
11/18/2019 JA	Telephone conference with M. Ferguson re: admission of law and mandamus; initial review of draft Response to Plaintiffs' Motion to Compel Bank Records.	350.00/hr	0.50	175.00
11/19/2019 JA	Two telephone conferences with M. Ferguson re: Response to Motion to Compel and Motion for Judicial Admission; reviewed correspondence from Court Coordinator re: pre-trial filing requirements; Revised Response to Motion to Compel.	350.00/hr	2.50	875.00
11/20/2019 JA	Worked on Response to Plaintiffs' Motion to Compel Inspection of Bank Records; reviewed tax lien documents.	350.00/hr	6.40	2,240.00
11/21/2019 JA	Completed Defendant's Response to Plaintiffs' Motion to Compel; reviewed AUP report from Kyle Hendrick; reviewed and revised Defendant's Second Plea in Abatement; drafted proposed form of Order Denying Plaintiffs' Motion to Compel; drafted proposed orders on second plea in abatement.	350.00/hr	4.80	1,680.00
11/22/2019 JA	Travel to and attend hearing on motion to compel; Conference with M. Ferguson re: trial strategy.	350.00/hr	2.50	875.00
11/25/2019 JA	Reviewed draft AUP from K. Hendrick.	350.00/hr	0.20	70.00
11/26/2019 JA	Receive and review correspondence from C. Moore re: reinstatement, bank records hearing, and document inspection issues; Telephone conference with M. Ferguson re: same; Telephone conference with C. Moore re: bank records hearing, trial prep, etc. .	350.00/hr	0.80	280.00
12/2/2019 JA	Receive and review correspondence from K. Hendrick re: request for execution of release.	350.00/hr	0.10	35.00
12/4/2019 JA	Telephone conference with C. Moore re: trial status and issues; Telephone conference with M. Ferguson re: trial strategy and potential appellate remedy.	350.00/hr	1.10	385.00
12/5/2019 JA	Reviewed court's notice of hearing on Motion to Compel; reviewed Frazier's supplemental production (fees statement and irrelevant government doc); review appellate standards for mandamus and agreed appeal.	350.00/hr	0.70	245.00
AB	Conference regarding motion to compel.	350.00/hr	0.30	105.00

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
12/8/2019	JA Multiple telephone conferences with M. Ferguson re: pretrial and appellate strategy.	350.00/hr	1.30	455.00
12/9/2019	JA Trial prep, including drafted Defendant's witness list, exhibit list, motion in limine, and jury charge submission; Telephone conference with C. Moore re: continuance; multiple Telephone conference with M. Ferguson re: pretrial filings.	350.00/hr	8.60	3,010.00
12/10/2019	JA Reviewed all of Plaintiffs' pretrial filings, including motion for continuance; correspondence to M. Ferguson re: same; worked on amended notice of judicial admission; multiple telephone conferences with M. Ferguson re: pleadings and strategy; began drafting motion in limine.	350.00/hr	5.00	1,750.00
12/11/2019	JA Attended hearing on Plaintiff's motion to compel and motion for continuance.	350.00/hr	2.50	875.00
12/12/2019	JA Reviewed court's order granting continuance.	350.00/hr	0.10	35.00
12/16/2019	JA Reviewed AUP forwarded by K. Hendrick and forwarded same to M. Ferguson.	350.00/hr	0.20	70.00
1/9/2020	JA Exchanged correspondence with court coordinator re: status of appeal.	350.00/hr	0.00	NO CHARGE
1/21/2020	JA Brief conference with M. Ferguson and initial review of draft Petition for Writ of Mandamus.	350.00/hr	1.20	420.00
1/22/2020	JA Met with M. Ferguson re: draft petition for mandamus and appendix; work on application for writ of mandamus.	350.00/hr	13.10	4,585.00
1/23/2020	JA Worked and filed petition for mandamus and appendix; multiple conferences with court and opposing counsel re: trial setting.	350.00/hr	3.80	1,330.00
	AB Review petition for writ of mandamus; work on petition.	350.00/hr	4.00	1,400.00
1/29/2020	JA Reviewed court of appeals notice of request for responsive drafting by real party in interest.	350.00/hr	0.10	35.00
2/7/2020	JA Reviewed FAM's Response to Petition for Writ of Mandamus; prepared notes re: Reply.	350.00/hr	1.20	420.00
2/11/2020	JA Worked on Reply in Support of Writ of Mandamus, including research and drafting; correspondence to M. Ferguson re: forwarding draft Reply.	350.00/hr	8.40	2,940.00
2/12/2020	JA Finalized and filed Relator's Reply in Support of Writ of Mandamus.	350.00/hr	3.20	1,120.00
	AB Review and revise reply brief; conferences regarding same.	350.00/hr	2.20	770.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
3/9/2020	JA	Reviewed notice from Court of Appeals re: specific supplemental briefing request.	350.00/hr 0.20	70.00
	JEC	Conference regarding status of appeal proceedings.	400.00/hr 0.20	80.00
3/11/2020	JA	Began drafting Supplemental Brief in Support of Mandamus.	350.00/hr 1.50	525.00
3/25/2020	JA	Reviewed correspondence from M. Ferguson re: info provided by business law expert.	350.00/hr 0.20	70.00
3/26/2020	JA	Worked on supplemental brief re: mandamus proceeding; Telephone conference with M. Ferguson re: legal research	350.00/hr 1.80	630.00
3/29/2020	JA	Worked on Supplemental Brief in Support of Petition for Writ of Mandamus	350.00/hr 7.50	2,625.00
3/30/2020	AB	Conference regarding brief. Review and revise proposed brief; conference regarding same.	350.00/hr 1.20	420.00
	JA	Completed drafting and file Relator's Supplemental Brief in Support of Mandamus.	350.00/hr 2.40	840.00
3/31/2020	JA	Reviewed FAM's supplemental brief to Court of Appeals; Telephone conference with M. Ferguson re: same; reviewed correspondence from Court of Appeals re: decision to be made without oral argument.	350.00/hr 0.70	245.00
5/12/2020	JA	Reviewed Court of Appeals' opinion denying petition for mandamus; Telephone call from M. Ferguson re: absurdity of it all (NC)	350.00/hr 0.10	35.00
5/13/2020	JA	Telephone conference with M. Ferguson re: appellate strategy; reviewed TRAPs re: mandamus proceeding in Texas Supreme Court; reviewed petition for WOM and supplemental briefing.	350.00/hr 0.70	245.00
5/14/2020	JA	Drafted correspondence re: forwarding WOM briefing; worked on petition for WOM to Supreme Court.	350.00/hr 1.70	595.00
5/15/2020	JA	Exchanged correspondence with court coordinator and opposing counsel re: scheduling a special trial setting for this case; Telephone conference with Supreme Court of Texas clerk re: local rules and requirements; reviewed correspondence from C. Moore re: CPA witness availability; correspondence to M. Ferguson re: related issues.	350.00/hr 0.70	245.00
5/18/2020	JA	Worked on petition for writ of mandamus and mandamus record; multiple exchanges with trial court coordinator and opposing counsel re: trial setting dates.	350.00/hr 4.90	1,715.00
	AB	Conference regarding petition for writ of mandamus; review petition for writ of mandamus.	350.00/hr 2.30	805.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
5/19/2020	JA	Continued working on mandamus, including significant edits to meet word number restrictions; reviewed court's notice of special setting trial notice.	350.00/hr 4.70	1,645.00
	AB	Review and revise petition for writ of mandamus; conferences with J. Ankele regarding same.	350.00/hr 2.50	875.00
5/20/2020	JA	Finalized and filed petition for WOM with Texas Supreme Court; confirmed filing acceptance.	350.00/hr 0.70	245.00
	AB	Revise petition for writ of mandamus; conference with J. Ankele regarding same.	350.00/hr 0.20	NO CHARGE
5/26/2020	JA	Drafted Defendant's Notice regarding Special Setting.	350.00/hr 0.70	245.00
7/1/2020	JA	Reviewed notice from Texas Supreme Court re: acknowledgment of filing of petition for writ of mandamus and forwarded same to M. Ferguson.	350.00/hr 0.10	35.00
7/2/2020	DL	Conference with Jason Ankele; phone call with Texas Supreme Court Clerk; prepare letter to court; efile letter with the court.	175.00/hr 1.10	192.50
8/28/2020	JA	Reviewed notice from Texas Supreme Court denying petition for writ of mandamus.	350.00/hr 0.10	35.00
8/31/2020	DL	Court records search.	150.00/hr 0.40	60.00
	JA	Telephone conference with M. Ferguson re: next steps.	350.00/hr 0.40	140.00
9/4/2020	JA	Researched deadline to file motion for reconsideration; confirmed designation of lead counsel on file in trial court.	350.00/hr 0.20	70.00
9/11/2020	JA	Began drafting Motion for Reconsideration.	350.00/hr 2.50	875.00
	AB	Conference regarding motion for reconsideration.	350.00/hr 0.30	105.00
9/13/2020	JA	Drafted Motion for Reconsideration.	350.00/hr 5.30	1,855.00
9/14/2020	JA	Finalized and filed Relator's Motion for Rehearing in the Texas Supreme Court.	350.00/hr 1.30	455.00
	AB	Review and revise motion for reconsideration.	350.00/hr 0.90	315.00
10/16/2020	JA	Reviewed notice from Texas Supreme Court of denial of motion for rehearing.	350.00/hr 0.10	35.00
11/5/2020	JA	Telephone call from C. Moore re: suggestion of agreed continuance; reviewed and forwarded correspondence from C. Moore to court coordinator re: trial setting; Two telephone conferences with M. Ferguson re: status and strategy (NC).	350.00/hr 0.40	140.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
11/5/2020	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr 0.10	40.00
11/10/2020	JA	Reviewed correspondence from court coordinator re: trial setting.	350.00/hr 0.10	35.00
11/11/2020	JA	Correspondence to court coordinator re: unavailable for March trial settings.	350.00/hr 0.10	35.00
11/12/2020	JA	Reviewed court coordinator correspondence re: trial setting in May 2021; multiple exchange with M. Ferguson and court coordinator re: May trial setting.	350.00/hr 0.20	70.00
11/16/2020	JA	Reviewed correspondence and proposed form of scheduling order from C. Moore and forwarded same to M. Ferguson.	350.00/hr 0.20	70.00
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr 0.10	40.00
11/17/2020	JA	Reviewed correspondence from M. Ferguson re: strategy; Telephone conference with M. Ferguson re: standing arguments; reviewed statute re: challenging constitutionality of statute.	350.00/hr 0.40	140.00
11/19/2020	JA	Brief telephone conference with M. Ferguson re: scheduling order; correspondence to C. Moore re: continuance and scheduling order.	350.00/hr 0.20	70.00
11/24/2020	JA	Exchanged correspondence with C. Moore re: filing of motion for continuance and proposed scheduling order.	350.00/hr 0.00	NO CHARGE
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr 0.20	80.00
11/25/2020	JA	Reviewed Joint Motion for Continuance and proposed form of scheduling order and forwarded same to M. Ferguson.	350.00/hr 0.00	NO CHARGE
11/30/2020	JA	Reviewed court orders re: continuance and trial setting.	350.00/hr 0.10	35.00
12/2/2020	JA	Calendared all deadlines per scheduling order.	350.00/hr 0.10	35.00
12/15/2020	JA	Reviewed correspondence from M. Ferguson re: agreed appeal provision.	350.00/hr 0.00	NO CHARGE
1/14/2021	JA	Reviewed correspondence from C. Moore re: intent to reset motions.	350.00/hr 0.10	35.00
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr 0.10	40.00
2/8/2021	JA	Telephone conference with M. Ferguson re: status, including deadlines.	350.00/hr 0.20	70.00
2/17/2021	JA	Telephone conference with M. Ferguson re: strategy.	350.00/hr 1.00	350.00

Mike Ferguson - via email

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			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
2/18/2021	JA	Reviewed correspondence from C. Moore re: AFI bank records; Telephone conference with M. Ferguson re: strategy.	350.00/hr	0.70	245.00
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
2/19/2021	JA	Drafted Request for Production and Interrogatories to Plaintiff; Telephone conference with M. Ferguson re: discovery and status.	350.00/hr	2.10	735.00
2/23/2021	JA	Reviewed bank and business docs on flashdrive produced by I. Ghrist to C. Moore.	350.00/hr	0.40	140.00
2/24/2021	JA	Correspondence to M. Ferguson forwarding Frazier's document production.	350.00/hr	0.10	35.00
2/28/2021	JA	Drafted objections and responses to Plaintiff's first set of authentication interrogatories.	350.00/hr	0.70	245.00
3/5/2021	JA	Reviewed correspondence from C. Moore re: adding M. Ferguson as party to the lawsuit; reviewed correspondence from C. Moore re: authenticity as to personal bank and other records of M. Ferguson; Telephone conference with M. Ferguson re: status and strategy.	350.00/hr	0.70	245.00
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr	0.20	80.00
3/8/2021	JA	Reviewed correspondence from M. Ferguson re: materials for motion to quash bank records effort; reviewed correspondence from M. Ferguson re: applicable BOC and Property Code provisions; reviewed Plaintiff's Motion for Leave to add Ferguson as party; reviewed Plaintiff's Second Motion to Compel; brief telephone conference with M. Ferguson re: strategy; exchanged correspondence with opposing counsel re: hearing date availability.	350.00/hr	1.00	350.00
3/9/2021	JA	Telephone conference with M. Ferguson re: response to motions filed by Frazier; reviewed notice of hearing on Frazier's motions.	350.00/hr	0.60	210.00
3/12/2021	JA	Reviewed discovery responses from plaintiff and forwarded same to M. Ferguson.	350.00/hr	0.20	70.00
	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
3/13/2021	JEC	Receive and review email correspondence from client.	400.00/hr	0.10	40.00
3/15/2021	JA	Revised Motion for Substitution of Counsel to Motion to Withdraw and for Substitution; revised related order; exchanged correspondence with C. Moore re: conference requirement; filed motion and proposed order; Telephone conference with M. Ferguson re: status (NC).	350.00/hr	0.90	315.00

Mike Ferguson - via email

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			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
3/15/2021	JEC	Receive and review email correspondence from Caleb Moore.	400.00/hr	0.10	40.00
	JEC	Receive and review email correspondence from client.	400.00/hr	0.10	40.00
3/16/2021	JA	Reviewed Order on withdrawal of counsel (.1)	350.00/hr	0.00	NO CHARGE
4/7/2021	JA	Conference call with M. Ferguson re: status of case and trial strategy; reviewed order denying adding M. Ferguson as party (NC)	350.00/hr	1.10	385.00
4/8/2021	JA	Telephone conference with M. Ferguson re: trial preparation.	350.00/hr	0.80	280.00
4/9/2021	JA	Reviewed correspondence from court coordinator re: deadline to submit matters for hearing.	350.00/hr	0.10	35.00
4/12/2021	JA	Reviewed multiple exchanges with court coordinator re: pretrial hearing; Telephone conference with M. Ferguson re: trial preparation.	350.00/hr	3.00	1,050.00
4/13/2021	JA	Reviewed emails re: continuance and scheduling; Telephone conference with M. Ferguson re: strategy; drafted Motion for Judicial Notice of Adjudicative Facts, drafted amended motion in limine, revised motion to DQ, drafted Objections to Plaintiffs' Exhibits, drafted Objections to Plaintiffs' witnesses.	350.00/hr	4.40	1,540.00
4/14/2021	JA	Conference with M. Ferguson re: pretrial filings; reviewed and revised pretrial filings; Telephone conference with M. Ferguson re: communication to court re: settings.	350.00/hr	0.60	210.00
4/15/2021	JA	Reviewed partition documents from Wise County; drafted Order on Adjudicated facts; researched and prepared for various motions to be heard at pretrial; drafted Notice of Appearance.	350.00/hr	4.20	1,470.00
4/16/2021	JA	Travel to and attend pretrial hearing; drafted Cert of Conference on Defendant's Request for Judicial Notice of Adjudicative Facts; reviewed court's notice of trial setting; reviewed court's order granting motion for continuance.	350.00/hr	4.10	1,435.00
4/19/2021	JA	Reviewed correspondence from C. Moore re: effort to obtain AUP accountant's testimony; reviewed M. Ferguson's response to request; reviewed court's order denying motion to disqualify C. Moore; exchanged correspondence with court coordinator requesting available hearing dates on request for judicial notice; Conference with M. Ferguson re: strategy; correspondence to court coordinator confirming hearing date on request for judicial notice; drafted Notice of Hearing; reviewed correspondence re: inapplicability of conversion claim to this case.	350.00/hr	1.10	385.00
4/20/2021	JA	Reviewed correspondence from C. Moore re: modification of requested adjudicative facts; Telephone conference with M. Ferguson re: responding to C. Moore re: judicial notice meeting; legal research re: conversion as non-viable cause of	350.00/hr	1.90	665.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
	action; drafted Subpoena for FAM's corporate representative to appear at hearing; drafted correspondence responding to C. Moore re: adjudicative facts.			
4/21/2021 JA	Conference re: judicial notice strategy; reviewed Sec of State summary of FAM terminations relative to date of creation of BOC; filed subpoenas for FAM and Frazier to appear at Hearing on Adjudicative Facts; forwarded correspondence to C. Moore re: Judicial Notice proceeding; revised proposed form of order and filed same; correspondence to C. Moore re: availability for call; exchange with C. Moore re: subpoenaing B. Frazier to hearing on judicial notice; Telephone conference with M. Ferguson re: status and strategy.	350.00/hr	1.40	490.00
4/22/2021 JA	Reviewed correspondence from C. Moore re: discovery production and forwarded to M. Ferguson.	350.00/hr	0.10	35.00
4/23/2021 JA	Reviewed confirmation of service of B. Frazier and FAM for hearing.	350.00/hr	0.10	35.00
4/26/2021 JA	Reviewed and forwarded correspondence from C. Moore re: judicial notice issues; reviewed plaintiff's response to defendant's request for judicial notice; Telephone conference with M. Ferguson re: strategy; reviewed and forwarded correspondence from C. Moore to court coordinator asking for Plaintiff's request for judicial notice to also be heard at hearing.	350.00/hr	1.00	350.00
4/27/2021 JA	Telephone call from court coordinator re: need to reschedule hearing date because of trial conflict.	350.00/hr	0.20	70.00
4/28/2021 JA	Reviewed correspondence from C. Moore to court coordinator confirming hearing is reset; Telephone conference with court coordinator re: same; reviewed correspondence from C. Moore re: conference on supplemental financial data; drafted Amended Notice of Hearing on Judicial Notice of Adjudicative Facts; Telephone conference with M. Ferguson re: document production to Frazier; correspondence to C. Moore re: release from subpoenas.	350.00/hr	0.70	245.00
4/29/2021 JA	Reviewed M. Ferguson's response to C. Moore re: books and records; reviewed exchange re: document production/explanation; brief telephone conference with M. Ferguson re: status and strategy; reviewed Rule 172 and pleadings re: AUP; Conference with M. Ferguson re: AUP, Rule 172, and responding; reviewed Plaintiffs' Third Motion to Compel and Court's Order on same; drafted MSJ on issue of withdrawal and automatic redemption.	350.00/hr	3.40	1,190.00
4/30/2021 JA	Reviewed M. Ferguson's comments re: draft MSJ; revised MSJ per M. Ferguson's comments.	350.00/hr	0.70	245.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
5/4/2021	JA	Reviewed Plaintiffs' Motion for Admission of AUP report; reviewed C. Moore's correspondence to court coordinator re: requested time to hear motion; Telephone call from M. Ferguson re: plaintiff's motion.	350.00/hr 0.30	105.00
5/6/2021	JA	Reviewed notice of hearing on plaintiffs' motion to take testimony.	350.00/hr 0.10	35.00
5/13/2021	JA	Reviewed notice from court coordinator re: trial logistics (.1)	350.00/hr 0.00	NO CHARGE
5/17/2021	JA	Telephone conference with M. Ferguson re: strategy (.3).	350.00/hr 0.00	NO CHARGE
5/18/2021	JA	Reviewed AUP engagement letter and AUP Report; drafted and filed Response to Plaintiff's Request for Judicial Notice and Order denying same; drafted and filed Response to Plaintiff's Motion for Testimony and Order denying same; Continued to prepare for hearing, including research and revising order.	350.00/hr 3.80	1,330.00
5/19/2021	JA	Telephone conference with M. Ferguson re: hearings; prepare for, travel to, and attend hearing on Request for Judicial Notice and motion to compel testimony; reviewed correspondence from C. Moore to CPA re: deposition; reviewed court's orders.	350.00/hr 3.70	1,295.00
5/20/2021	JA	Revised MSJ (automatic withdrawal and redemption) and forwarded same to M. Ferguson.	350.00/hr 0.80	280.00
5/21/2021	JA	Telephone conference with M. Ferguson re: MSJ on automatic withdrawal and redemption; filed MSJ and reviewed correspondence from C. Moore re: need to leave of court; drafted Motion to Strike Conversion Claim.	350.00/hr 1.90	665.00
5/24/2021	JA	Revised motion to strike conversion claim into brief supporting entry of an order; drafted proposed form of order as to conversion cause of action; correspondence to Judge Fitzpatrick forwarding brief and proposed form of order; multiple exchanges re: scheduling CPA deposition; reviewed and revised brief on conversion re: specific chattel issue; continued drafting and revising documents related to conversion issue; revised motion for summary judgment into plea to jurisdiction.	350.00/hr 3.70	1,295.00
5/25/2021	JA	Exchanged correspondence re: ordering past hearing transcript; revised plea to jurisdiction; Telephone conference with M. Ferguson re: strategy; filed conversion claim documents and forwarded same to court coordinator; drafted Plea to Jurisdiction as to extinguished claims.	350.00/hr 3.20	1,120.00
5/26/2021	JA	Reviewed revised pleas to jurisdiction; Conference with M. Ferguson re: same; exchange with court and opposing counsel re: conversion claims; drafted motion to enter order re: conversion; reviewed deposition notice for Kent Ray; drafted Motion for Protective Order as to Kent Ray; filed pleas to jurisdiction; exchanges with court coordinator re: scheduling	350.00/hr 3.00	1,050.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
	hearings; drafted and filed notice of submission as to conversion order.			
5/27/2021 JA	Reviewed Plaintiffs' Response to Motion to Enter Order re: Conversion claim and started outlining response; added to Motion for Protective Order; drafted notice of hearing on Motion for Protective Order and proposed form of protective order and filed all with the court.	350.00/hr	1.40	490.00
5/28/2021 JA	Telephone call from court coordinator re: setting on motion for protective order; reviewed correspondence from C. Moore re: Kent Ray deposition; Conference with M. Ferguson re: same; began drafting Reply in support of striking conversion claim; reviewed Plaintiffs' Supplemental disclosure response.	350.00/hr	1.40	490.00
6/1/2021 JA	Completed and filed reply in support of striking conversion claim; reviewed Plaintiffs' Response to Motion for Protective Order; drafted Reply in support of Motion for Protective Order; multiple telephone conferences with M. Ferguson re: status and strategy; correspondence to Kent Ray re: forwarding motion to quash and related documents.	350.00/hr	4.50	1,575.00
6/3/2021 JA	Reviewed Order denying motion for protective order; reviewed order denying motion to strike conversion claim; Two telephone conferences with M. Ferguson re: status and strategy; briefly prepared for Kent Ray deposition; drafted correspondence to judge re: pleas to jurisdiction.	350.00/hr	3.00	1,050.00
6/4/2021 JA	Travel to and attend deposition of Kent Ray; Telephone conference with court coordinator re: scheduling submission of pleas to jurisdiction; multiple communications with C. Moore re: attempting to set pleas for submission; reviewed and filed letter to judge re: jurisdiction.	350.00/hr	5.80	2,030.00
6/7/2021 JA	Reviewed C. Moore's billing statements as produced by C. Moore; Conference with M. Ferguson re: status	350.00/hr	0.70	245.00
6/8/2021 JA	Reviewed correspondence from C. Moore re: trial preparation; Telephone conference with M. Ferguson re: same; cursory review of hearing transcript with Kyle Hendrick's testimony.	350.00/hr	0.60	210.00
6/9/2021 JA	Reviewed most recent hearing transcript; Telephone conference with M. Ferguson re: same.	350.00/hr	0.60	210.00
6/11/2021 JA	Reviewed C. Moore's correspondence to court coordinator re: pretrial matters; correspondence to court coordinator re: pretrial hearing setting.	350.00/hr	0.20	70.00
6/14/2021 JA	Telephone conference with M. Ferguson re: status; reviewed correspondence from court coordinator re: Court's reset of pretrial hearing time and agreement to hear pleas to jurisdiction.	350.00/hr	0.70	245.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
6/15/2021	JA	Exchanges with court coordinator re: hearings on pleas to jurisdiction; drafted Notice of Hearing on Pleas to Jurisdiction; Two telephone conferences with M. Ferguson re: status and strategy; reviewed additional emails with exhibits and documents from M. Ferguson.	350.00/hr 1.70	595.00
6/17/2021	JA	Drafted proposed forms of orders and correspondence with court coordinator re: same; prepared for hearing on pleas to the jurisdiction, including review of Plaintiffs' Response to Pleas to Jurisdiction.	350.00/hr 5.00	1,750.00
6/18/2021	JA	Travel to and attend hearing on Defendants' pleas to the jurisdiction; reviewed court's orders denying pleas and researched appellate options; ordered transcript of hearing from court reporter; researched appellate review options.	350.00/hr 5.40	1,890.00
6/20/2021	JA	Telephone conference with M. Ferguson re: strategy; correspondence to C. More re: Conference on continuance.	350.00/hr 0.70	245.00
6/21/2021	JA	Reviewed transcript from Kent Ray deposition and forwarded same to M. Ferguson; drafted Defendant's Motion for Continuance; reviewed various pretrial filings and multiple telephone conferences with M. Ferguson re: status; filed Defendant's Second Motion for Continuance; exchanged correspondence with C. Moore re: pretrial filings.	350.00/hr 4.50	1,575.00
6/22/2021	JA	Telephone conference with M. Ferguson re: status and strategy; correspondence to court reporter forwarding pretrial filings; reviewed plaintiffs' amended jury charge; reviewed plaintiffs' amended motion in limine; reviewed Plaintiffs' response to motion for continuance; drafted Amended Motion for Continuance and also a Motion for Permission to Appeal Interlocutory Orders; Telephone conference with court coordinator re: submission of motion; reviewed FAM's Response to Motion to Permit Appeal.	350.00/hr 5.20	1,820.00
6/23/2021	JA	Multiple telephone conferences with M. Ferguson re: litigation strategy; exchange correspondence with court coordinator re: various pretrial filings; drafted proposed orders on motion for continuance and motion to permit appeal of interlocutory orders; reviewed correspondence from court coordinator advising of hearing date; Telephone call from M. Ferguson re: status.	350.00/hr 2.00	700.00
6/24/2021	JA	Prepare for and attend hearing on motion for continuance and motion to permit appeal; Telephone conference with M. Ferguson re: same; Conference call with court re: denial of continuance; continued pre-trial prep, including exhibit review and drafting of amended exhibit list and communicating with C. Moore and M. Ferguson; reviewed additional communications from C. Moore to me and to the Court staff.	350.00/hr 4.40	1,540.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
6/25/2021	JA Reviewed court's order denying motion for continuance; Telephone conference with M. Ferguson re: status; Conference call with court re: trial logistics; Telephone conference with M. Ferguson re: same; reviewed list of jurors and forwarded to M. Ferguson; reviewed suggestion of bankruptcy filed by M. Ferguson; multiple correspondences to court personnel trying to confirm court was aware of bankruptcy.	350.00/hr	1.80	630.00
6/28/2021	JA Reviewed court's acknowledgement of bankruptcy filing; reviewed C. Moore's correspondence re: appearance today and court's response; Telephone conference with M. Ferguson re: status.	350.00/hr	0.40	140.00
	For professional services rendered		377.60	\$131,580.00
	Additional Charges :			
4/1/2017	Federal Express to Caleb Moore, 3/23/17			23.00
9/18/2019	Victory Document Services, Inc. - fee for enlarged exhibit board			227.33
	Parking fee at courthouse			7.00
9/30/2019	September photocopies - black & white			NO CHARGE
	September photocopies - color			28.95
10/25/2019	Parking fee at courthouse			10.00
10/31/2019	October photocopies - black & white			5.10
11/15/2019	Parking fee at courthouse for attending hearing on Plea to Jurisdiction.			5.00
11/22/2019	Parking fee - Tarrant County Court			5.00
11/30/2019	November photocopies - color			13.95
12/11/2019	Parking fee at courthouse			5.00
12/31/2019	December photocopies - black & white			4.40
	December photocopies - color			7.95
1/23/2020	Filing Fee - Petition for Writ of Mandamus			159.48
1/31/2020	January photocopies - color			27.90
5/19/2020	Filing Fee - Petition for Writ of Mandamus			159.48

Mike Ferguson - via email

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	<u>Amount</u>
4/23/2021 Process Service Fee - B. Frazier	259.00
5/3/2021 Parking fee at court, 04/16/21	7.00
5/19/2021 Parking fee at court, 05/19/21	5.00
6/18/2021 Parking fee at court	5.00
6/30/2021 photocopies - color, June 2021	7.80
Total additional charges	<u>\$973.34</u>
For professional services rendered	<u>377.60</u> <u>\$132,553.34</u>

Sullivan & Cook, LLC
600 E. Las Colinas Blvd, Suite 1300
Irving, TX 75039
Jeffrey E. Cook, Attorney at Law

Invoice submitted to:
Mike Ferguson - via email

March 17, 2022

In Reference To: **CASE NO. 21-41517-ELM: *In re Anson Financial, Inc., Debtor B. Frazier Management, Inc. and Brian H. Frazier v. Anson Financial, Inc.***

Professional Services

			<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
2/8/2022	JA	Reviewed correspondence from M. Ferguson re: federal court trial; Telephone conference with M. Ferguson re: same.	395.00/hr	0.60	237.00
2/9/2022	JA	Conference re: representation of AFI in adversary proceeding; drafted agreement; reviewed and revised declaration re: representation of AFI; Telephone conference with M. Ferguson re: AFI trial; Telephone conference with K. Hernandez re: AFI representation.	395.00/hr	0.80	316.00
2/10/2022	JA	Reviewed scheduling order and scheduled all deadlines; reviewed motion to retain counsel.	395.00/hr	0.40	158.00
2/21/2022	JA	Exchanged correspondence re: hearing(s) on March 7.	395.00/hr	0.10	39.50
2/22/2022	JA	Reviewed correspondence re: whether limine hearing still necessary.	395.00/hr	0.10	39.50
2/24/2022	JA	Reviewed correspondence from Lyndel Vargas re: need for limine hearing on non-jury trial; reviewed Caleb Moore's response; Telephone conference with M. Ferguson re: status; Telephone conference with K. Hernandez re: status and strategy.	395.00/hr	1.20	474.00
2/25/2022	JA	Reviewed exchange of multiple correspondence re: limine and pretrial hearings.	395.00/hr	0.10	39.50
2/26/2022	JA	Began reviewing federal research forwarded by M. Ferguson.	395.00/hr	0.50	197.50
2/28/2022	JA	Reviewed additional federal research from M. Ferguson.	395.00/hr	0.20	79.00

Mike Ferguson - via email

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		<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
3/1/2022	JA	Met with K. Hernandez and M. Ferguson re: strategy session and pretrial preparation plan; continued reviewing federal research forwarded by M. Ferguson and corresponded with him re: potential strategy.	395.00/hr 2.40	948.00
3/2/2022	JA	Reviewed multiple correspondences from K. Hernandez re: legal approach to trial; reviewed correspondence re: limine hearing; Conference re: jurisdiction; multiple telephone conferences with M Ferguson re: trial information and strategy.	395.00/hr 1.50	592.50
3/3/2022	JA	Reviewed correspondence from L. Vargas agreeing to remove limine hearing; Reviewed correspondence to court clerk removing limine hearing; Worked on Joint Pretrial Order, including review of local rules and Telephone conference with K. Hernandez.	395.00/hr 1.00	395.00
3/4/2022	JA	Reviewed order granting employment in adversary proceeding; Telephone conference with M. Ferguson regarding status and strategy; Reviewed attorney's fees history bill for redaction.	395.00/hr 1.50	592.50
3/6/2022	JA	Cursory review of research and analysis forwarded by M. Ferguson.	395.00/hr 0.20	79.00
3/8/2022	JA	Reviewed exchange between counsel re: scope of hearing; worked on pretrial briefing, including Telephone conference with K. Hernandez.	395.00/hr 2.10	829.50
3/9/2022	JA	Completed review and revision of pretrial order and forwarded same to K. Hernandez; Conference with K. Hernandez regarding pretrial order and briefing.	395.00/hr 1.30	513.50
3/10/2022	JA	Reviewed revised pre-trial order and FAM's proposed stipulated facts; Telephone conference with K. Hernandez regarding same.	395.00/hr 0.50	197.50
3/11/2022	JA	Reviewed K. Hernandez's analysis of amendment of BOC; Telephone conference with K. Hernandez re: opposing counsel's resistance to logical pretrial order; reviewed correspondence from Lyndel Vargas re: Joint Pretrial Order.	395.00/hr 0.40	158.00
3/14/2022	JA	Reviewed multiple exchange of correspondence between L. Vargas and K. Hernandez; reviewed research from K. Hernandez re: standing; Telephone conference with K. Hernandez re: same and trial strategy.	395.00/hr 0.40	158.00
3/15/2022	JA	Reviewed research re: standing and capacity and extinguishment of claims; reviewed updated draft of joint pretrial order from L. Vargas.	395.00/hr 1.10	434.50
3/16/2022	JA	Reviewed draft of Debtor's exhibit and witness list; client meeting re: preparation of exhibit list and witness list and general trial preparation.	395.00/hr 4.10	1,619.50

Mike Ferguson - via email

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	<u>Hours</u>	<u>Amount</u>
For professional services rendered	20.50	\$8,097.50
	<u> </u>	<u>Amount</u>
For professional services rendered	20.50	\$8,097.50

Invoice

J. Michael Ferguson, P.C.

Attorneys at Law

62 Main Street, Suite 310

Colleyville, Texas 76034

Phone (817) 267-1008, Email: legal@fnalegal.com

Bill To:

Customer Name

Anson Financial, Inc.

For Project

B. Frazier Management, Inc. v. Anson

Item	Item Description	Date	Quantity	Billable Rate	Total Charges	Itemization of Expense or Service Items
Attorney Fee	J. Michael Ferguson	8/30/2017	0.5	\$300.00	\$150.00	Review file
Legal Assistant	Nate Richards	9/5/2017	2	\$100.00	\$200.00	
Legal Assistant	David G. Ayala	9/11/2017	2	\$100.00	\$200.00	Research over Frazier and potential DTPA violations
Legal Assistant	Nate Richards	9/11/2017	6	\$100.00	\$600.00	Researched how to dismiss their claims
Legal Assistant	David G. Ayala	9/12/2017	1.5	\$100.00	\$150.00	Researching Tex. Bus. Org. Code § 11.201
Legal Assistant	David G. Ayala	9/15/2017	4	\$100.00	\$400.00	Researching procedural way to win summary judgment
Legal Assistant	David G. Ayala	9/15/2017	2	\$100.00	\$200.00	Writing amended summary judgment

Legal Assistant	Nate Richards	9/15/2017	0.5	\$100.00	\$50.00	Amended Motion to Substitute Counsel and Drafted Order
Legal Assistant	Nate Richards	9/15/2017	0.3	\$100.00	\$30.00	Emailed Caleb Moore and inserted Certificate of Conference into Motion to Substitute Counsel
Legal Assistant	Nate Richards	9/15/2017	4.3	\$100.00	\$430.00	Developed arguments for MSJ
Legal Assistant	David G. Ayala	9/18/2017	3.8	\$100.00	\$380.00	Writing amended summary judgment
Attorney Fee	J. Michael Ferguson	9/18/2017	0.3	\$300.00	\$90.00	Reviewed First Amended Motion to Substitute Counsel w Order
Legal Assistant	Nate Richards	9/18/2017	0.3	\$100.00	\$30.00	Filed Amended Motion to Substitute Counsel and Order
Legal Assistant	Nate Richards	9/19/2017	2	\$100.00	\$200.00	Reviewed and Edited MSJ from David
Legal Assistant	David G. Ayala	9/26/2017	2.5	\$100.00	\$250.00	HOA research
Legal Assistant	Nate Richards	10/9/2017	0.5	\$100.00	\$50.00	Reviewed and Edited Supplemental Response to Frazier Request
Legal Assistant	Nate Richards	10/9/2017	1.3	\$100.00	\$130.00	Downloaded Files from Court Registry, Created Schedule from Scheduling Order in compliance w/ Level 2 Discovery
Legal Assistant	Nate Richards	10/10/2017	0.3	\$100.00	\$30.00	Set up file in DB and QB. Downloaded Judgment to DB from Registry. Calendar a day to check back w/ registry for petition info
Legal Assistant	Nate Richards	10/10/2017	1.5	\$100.00	\$150.00	Reviewed P's Response to MSJ, our unfiled Amended MSJ. Developed further arguments. Outlined current arguments.
Legal Assistant	Nate Richards	10/10/2017	2.5	\$100.00	\$250.00	Researched issues for MSJ. Edited Draft MSJ. Reworked Drafted of MSJ
Attorney Fee	J. Michael Ferguson	10/11/2017	2	\$300.00	\$600.00	Researched issue of defunct entity for over 3 years. Multiple emails with Caleb Moore re JMF Deposition and scheduling.
Legal Assistant	Nate Richards	10/11/2017	1	\$100.00	\$100.00	Worked on Amended MSJ
Legal Assistant	Nate Richards	10/11/2017	2.3	\$100.00	\$230.00	Finished Draft Amended MSJ. Sent to Mike and Tom to review

Attorney Fee	J. Michael Ferguson	10/12/2017	4.5	\$300.00	\$1,350.00	Researched issue of defunct entity, discussed strategy with Nate and David. Pulled documents from Tx SOS website, discussed settlement with Caleb Moore in multiple emails, conferred on Abatement issue, prepared first amended Motion to Abate and filed with the Court.
Legal Assistant	Nate Richards	10/12/2017	6.5	\$100.00	\$650.00	Researched and worked on MSJ
Legal Assistant	Nate Richards	10/13/2017	2.5	\$100.00	\$250.00	Performed additional research, added more grounds for SJ, Finished Draft MSJ
Attorney Fee	J. Michael Ferguson	10/16/2017	2	\$300.00	\$600.00	Reviewed Case law and statutes for Amended Motion for Summary Judgment.
Attorney Fee	J. Michael Ferguson	10/16/2017	7.5	\$300.00	\$2,250.00	Drafted/Revised Amended Motion for Sumamry Judgment, Drafted Defendants First Amended Answer with Verification
Legal Assistant	Nate Richards	10/16/2017	4	\$100.00	\$400.00	Researched more case law and statutes for the Amended MSJ. Incorporated the rest of the original draft in the new format after what Tom/Mike added.
Legal Assistant	Nate Richards	10/17/2017	3.3	\$100.00	\$330.00	Research regarding breach of contract claim. Edited MSJ.
Legal Assistant	Nate Richards	10/18/2017	2.3	\$100.00	\$230.00	Edited MSJ
Legal Assistant	Nate Richards	10/18/2017	0.5	\$100.00	\$50.00	Reformatted MSJ
Legal Assistant	Nate Richards	10/19/2017	1	\$100.00	\$100.00	Reviewed MSJ. Minor edits. Sent to Tom to look over.
Legal Assistant	Nate Richards	10/19/2017	1	\$100.00	\$100.00	Reviewed Response and Amended Pleading
Legal Assistant	Nate Richards	10/20/2017	0.8	\$100.00	\$80.00	Petition for taxes paid to taxing authority and order reviewed Frazier's responses and amended petitions. Set hearing for plea in abatement. Sent out notice of hearing. edited MSJ.
Legal Assistant	Nate Richards	10/20/2017	1.8	\$100.00	\$180.00	
Attorney Fee	J. Michael Ferguson	10/21/2017	7	\$300.00	\$2,100.00	Reviewed Cases pled by Plaintiff, researched issues of limitations, shareholder rights of single owner corp. and survival statute for terminated entity.

Attorney Fee	J. Michael Ferguson	10/22/2017	4	\$300.00	\$1,200.00	Finished research and reviewed pleadings of Plaintiff, Amended answer filed by Anson, organized argument for MSJ
Attorney Fee	J. Michael Ferguson	10/23/2017	4	\$300.00	\$1,200.00	Worked on draft of MSJ.
Legal Assistant	Nate Richards	10/23/2017	1	\$100.00	\$100.00	order and petition filed
						Rescheduled Notice of Hearing for plea in abatement.
Legal Assistant	Nate Richards	10/23/2017	2	\$100.00	\$200.00	Reviewed/minor editing of MSJ and further arguments Mike found.
Legal Assistant	Nate Richards	10/23/2017	1	\$100.00	\$100.00	Reviewed Tom's comments on MSJ. Researched. Talked with Mike about possible edits to MSJ, litigation strategy.
Legal Assistant	Nate Richards	10/24/2017	0.1	\$100.00	\$10.00	saving and uploading filed documents
Legal Assistant	Nate Richards	10/25/2017	0.5	\$100.00	\$50.00	notice of hearing
Legal Assistant	Nate Richards	10/25/2017	0.5	\$100.00	\$50.00	amended petition with exhibit
Legal Assistant	Nate Richards	10/27/2017	2.5	\$100.00	\$250.00	Read P's Motion for Release of Funds. Drafted Motion to Strike.
Legal Assistant	Nate Richards	10/27/2017	1.3	\$100.00	\$130.00	Edited Motion to Strike, drafted order, compiled exhibit packet.
Attorney Fee	J. Michael Ferguson	10/28/2017	2.5	\$300.00	\$750.00	Reviewed 1st Amended Answer and updated it. Updated Request for Disclosures to send to C. Moore. Reviewed Corporate Records obtained from Jentex. Sent to have scanned and upload to Dropbox in Shared folder.
Attorney Fee	J. Michael Ferguson	10/30/2017	5.5	\$300.00	\$1,650.00	Reviewed 1350 pages of Discovery sent by Plaintiff and supplemented Request for Disclosure
Legal Assistant	Nate Richards	10/30/2017	0.3	\$100.00	\$30.00	amended order and petition

Legal Assistant	Nate Richards	10/31/2017	2.5	\$100.00	\$250.00	filed amended petition and agreed order attempt to set hearing email to LBGS and Fortinberry
Legal Assistant	Nate Richards	11/1/2017	1	\$100.00	\$73.25	agreed order
Attorney Fee	Nate Richards	11/6/2017	1.8	\$200.00	\$360.00	Drafted No Evidence MSJ
Attorney Fee	Nate Richards	11/7/2017	1	\$200.00	\$200.00	Edited No Evidence MSJ
Attorney Fee	Nate Richards	11/8/2017	2	\$200.00	\$400.00	Reviewed MSJs, edited MSJs, researched cases.
Attorney Fee	Nate Richards	11/8/2017	1	\$200.00	\$200.00	Reviewd MSJs and told Mike they were ready for his final review.
Attorney Fee	Nate Richards	11/8/2017	1.3	\$200.00	\$260.00	Attorney conference and then edited No Evidence MSJ
Attorney Fee	Nate Richards	11/10/2017	1.8	\$200.00	\$360.00	Compiled Exhibits, edited MSJ one last time and Filed MSJ and No evidence MSJ
Attorney Fee	Nate Richards	11/13/2017	0.5	\$200.00	\$100.00	Drafted Notice of hearing, called court and replaced abatement for MSJs
Attorney Fee	Nate Richards	11/28/2017	2.8	\$200.00	\$560.00	Read motion for continuance, developed arguments against motion, started drafting response. Finished response.
Attorney Fee	Nate Richards	11/29/2017	2.3	\$200.00	\$460.00	Final edit of Response to Motion for Continuance and Orders. Filed and Served.
Attorney Fee	Nate Richards	11/29/2017	0.5	\$200.00	\$100.00	Attorney-client conference
Attorney Fee	Nate Richards	11/30/2017	6	\$200.00	\$1,200.00	Prepped for hearing. Created Powerpoint. Reviewed arguments. Went over strategy.
Attorney Fee	Nate Richards	12/1/2017	3	\$200.00	\$600.00	Conducted hearing over motion for continuance. Judge grated continuance until motion to compel is heard.
						Looked over response to motion to quash and motion to compel.
Attorney Fee	Nate Richards	12/1/2017	2.3	\$200.00	\$460.00	started reviewing response to MSJ.

Attorney Fee	Nate Richards	12/2/2017	0.5	\$200.00	\$100.00	Attorney-client conference
Attorney Fee	Nate Richards	12/4/2017	1	\$200.00	\$200.00	Reviewed Caleb's Response to MSJ
Attorney Fee	Nate Richards	12/4/2017	0.8	\$200.00	\$160.00	Started drafting Resp to Motion to Compel Depo
Attorney Fee	Nate Richards	12/4/2017	1.8	\$200.00	\$360.00	Read Motion to release funds/motion to compel payment. Drafted response to motion.
Attorney Fee	Nate Richards	12/5/2017	2.8	\$200.00	\$560.00	Reviewed arguments for MSJ. Reviewed P's REsponse to MSJ. constructed rough outline for oral argument.
Attorney Fee	Nate Richards	12/6/2017	1	\$200.00	\$200.00	Reviewed Response to Motion for funds. Edited. Reviewed and edited order. Compiled Exhibits. Filed.
Attorney Fee	Nate Richards	12/6/2017	2.5	\$200.00	\$500.00	Worked on Presentation for MSJ on Friday
Attorney Fee	Nate Richards	12/7/2017	6.2	\$200.00	\$1,240.00	Prepared for all the Motions for Hearing tomorrow.
Attorney Fee	Nate Richards	12/8/2017	4.3	\$200.00	\$860.00	Went to/argued for MSJ and other motions
Attorney Fee	Nate Richards	12/15/2017	0.3	\$200.00	\$60.00	Emailed Caleb regarding motion for mediation and motion for continuance. Assigned drafting of those motions to David.
Attorney Fee	Nate Richards	12/29/2017	0.8	\$200.00	\$160.00	Drafted and served Notice of Depo on Frazier
Attorney Fee	Nate Richards	1/2/2018	1.8	\$200.00	\$360.00	Emailed Caleb about mediation and continuance. Drafted motion to refer to mediation. filed motion.
Attorney Fee	Nate Richards	1/2/2018	1.3	\$200.00	\$260.00	Researched scheduling orders. Drafted Scheduling order. sent to Caleb for review and whether he agrees or not.
Attorney Fee	Nate Richards	1/2/2018	0.2	\$200.00	\$40.00	Called court coordinator to set hearing. Said to call back tomorrow.
Attorney Fee	Nate Richards	1/3/2018	2.3	\$200.00	\$460.00	Researched Rules. Drafted Motion for Continuance, Verification, Scheduling Order, and Order for Continuance. Edited and Filed. Will call to set hearing.
Attorney Fee	Nate Richards	1/3/2018	0.5	\$200.00	\$100.00	Set hearing for Motion to Refer to Mediation and Motion for Continuance. 1-11-18 at 10:30am. Also set Hearing for

						NEMSJ in February. First date open. Drafted notice of hearing for first two and filed/served.
Attorney Fee	Nate Richards	1/5/2018	1	\$200.00	\$200.00	Depo with Mike. follow up notice to Caleb.
Attorney Fee	Nate Richards	1/5/2018	0.5	\$200.00	\$100.00	Drafted letter to caleb about Frazier's Depo
Attorney Fee	Nate Richards	1/8/2018	1	\$200.00	\$200.00	Communicating with court reporters to get transcript from Depo of Mike. Setting up Depo of Frazier for tomorrow. Getting documents to them.
Attorney Fee	Nate Richards	1/8/2018	7.3	\$200.00	\$1,460.00	Prepared questions for depo.
Attorney Fee	Nate Richards	1/9/2018	5.3	\$200.00	\$1,060.00	Final Prep for and Conducted Frazier Deposition
Attorney Fee	Nate Richards	1/10/2018	1	\$200.00	\$200.00	Reviewed Depo Transcript in preparation for Hearing tomorrow
Attorney Fee	Nate Richards	1/10/2018	0.3	\$200.00	\$60.00	Drafted and filed notice of hearing for NEMSJ
Attorney Fee	Nate Richards	1/10/2018	0.5	\$200.00	\$100.00	Drafted and served 3rd supp RFD
Attorney Fee	Nate Richards	1/10/2018	0.5	\$200.00	\$100.00	Prepared docs for hearing tomorrow.
Attorney Fee	Nate Richards	1/11/2018	1.4	\$200.00	\$280.00	Argued Motion for Mediation and Motion for Continuance. Got both. Did not get scheduling order. Caleb whined about deposition issue.
Attorney Fee	Nate Richards	1/11/2018	0.5	\$200.00	\$100.00	Called McMullen for mediation dates. Emailed Caleb.
Attorney Fee	Nate Richards	1/11/2018	1	\$200.00	\$200.00	Trying to set up mediation with Caleb. Then dealing with his misrepresentations.
Attorney Fee	Nate Richards	1/12/2018	0.4	\$200.00	\$80.00	Letter to Caleb regarding video depo issue
Attorney Fee	Nate Richards	1/26/2018	0.5	\$200.00	\$100.00	Emailed Caleb regarding bank account issue. Reviewed his motion to compel.
Attorney Fee	Nate Richards	1/29/2018	0.3	\$200.00	\$60.00	Drafted Cross-notice of depo to video

Attorney Fee	Nate Richards	1/30/2018	2	\$200.00	\$400.00	Drafted Supplemental No Ev MSJ and Order. Filed and served.
Attorney Fee	Nate Richards	1/31/2018	1.3	\$200.00	\$260.00	Analyzed Plaintiffs' motion to compel
Attorney Fee	Nate Richards	2/2/2018	2	\$200.00	\$400.00	Mike's Deposition and Review
Attorney Fee	Nate Richards	2/5/2018	1.5	\$200.00	\$300.00	Worked on Response to Motion to Compel
Attorney Fee	Nate Richards	2/5/2018	1	\$200.00	\$200.00	Finished draft of Response to Motion to Compel
Attorney Fee	Nate Richards	2/6/2018	4	\$200.00	\$800.00	Final edits, review, and read through of Response to Motion to Compel. Compiled all Exhibits. Created exhibit packet. Combined Response and Packet. Sent to Mike for review
Attorney Fee	Nate Richards	2/6/2018	0.5	\$200.00	\$100.00	Emailed Caleb re: questions about emp agreement and motion to disqualify.
Attorney Fee	Nate Richards	2/7/2018	3	\$200.00	\$600.00	Prepared for hearing on the 8th. Created Powerpoint.
Attorney Fee	Nate Richards	2/8/2018	3	\$200.00	\$600.00	Finalized and edited prep for hearing. printed out presentation/order.
Attorney Fee	Nate Richards	2/8/2018	4	\$200.00	\$800.00	Attendance at hearing and travel to and from court. Attorney-client conference
Attorney Fee	Nate Richards	2/9/2018	1	\$200.00	\$200.00	Formulated proposal to Caleb. Emailed back and forth with him regarding proposal.
Attorney Fee	Nate Richards	2/14/2018	1	\$200.00	\$200.00	Reviewed No Evidence MSJ. Emailed Caleb back and forth re hearing.
Attorney Fee	Nate Richards	2/15/2018	1	\$200.00	\$200.00	Preparation for hearings
Attorney Fee	Nate Richards	2/16/2018	2	\$200.00	\$400.00	Reviewing Caleb's response. Researching.
Attorney Fee	Nate Richards	2/16/2018	3.5	\$200.00	\$700.00	Legal research in preparation for hearings.
Attorney Fee	Nate Richards	2/19/2018	2	\$200.00	\$400.00	Research

Attorney Fee	Nate Richards	2/21/2018	5.5	\$200.00	\$1,100.00	Prepped for No Ev MSJ Hearing
Attorney Fee	Nate Richards	2/22/2018	3.5	\$200.00	\$700.00	Review of argument, travel, hearing
Attorney Fee	Nate Richards	3/1/2018	1.5	\$200.00	\$300.00	Research/Brainstorming
Attorney Fee	Nate Richards	3/2/2018	0.5	\$200.00	\$100.00	Emails and read transcript of hearing
Attorney Fee	Nate Richards	3/6/2018	1.5	\$200.00	\$300.00	Drafted and researched for Motion for Rehearing. Filed.
Attorney Fee	Nate Richards	3/7/2018	0.5	\$200.00	\$100.00	Reviewed transcript again to confirm stance. Emailed Caleb.
Attorney Fee	Nate Richards	3/7/2018	1	\$200.00	\$200.00	Review of draft of confidentiality agreement. sent to Caleb.
Attorney Fee	Nate Richards	3/8/2018	0.8	\$200.00	\$160.00	Emails w/ Caleb and research
Attorney Fee	Nate Richards	3/9/2018	0.8	\$200.00	\$160.00	Reviewed 3rd Motion to Compel. Saved to file. Moved videos to Shared Folder.
Attorney Fee	Nate Richards	3/9/2018	2.3	\$200.00	\$460.00	Read through hearing transcript, took notes.
Attorney Fee	Nate Richards	3/12/2018	0.5	\$200.00	\$100.00	Spoke with court re rehearing. Set hearing. Drafted and served notice.
Attorney FeeEmailed Opposing Counsel	Nate Richards	3/14/2018	1	\$200.00	\$30.00	Emailed Opposing Counsel Informing OC that Court wanted us to use a confidentiality agreement and asked for him to review.
Attorney FeeEmailed Opposing Counsel	Nate Richards	3/14/2018	1	\$200.00	\$30.00	Emailed Opposing Counsel Explained stance on Protective order language he proposed
Email re Case	Nate Richards	3/20/2018	0.3	\$100.00	\$30.00	Email re Case Emailed Tomi Moore re: rehearing scheduling.
Attorney Fee	Nate Richards	3/23/2018	0.8	\$200.00	\$160.00	Reviewed Motion and talked with Tom

Attorney Fee	Nate Richards	3/28/2018	0.3	\$200.00	\$60.00	Drafted and filed notice of hearing
Attorney Fee	Nate Richards	4/26/2018	2.5	\$200.00	\$500.00	Reviewed Issue. Drafted Petition for Dec Action.
Attorney FeeEmailed	Nate Richards	5/2/2018	1	\$200.00	\$30.00	Emailed Opposing Counsel Conferred with Motion for Continuance
Attorney FeeEmailed	Nate Richards	5/2/2018	1	\$200.00	\$30.00	Emailed Opposing Counsel Conference for Motion to DQ
Attorney Fee	Nate Richards	5/7/2018	1	\$200.00	\$200.00	Drafted and filed motion for continuance of P's 3rd Motion to Compel
Attorney FeePhone Call With Court	Nate Richards	5/7/2018	1	\$200.00	\$30.00	Phone Call With Court RE: Motion for Continuance hearing
Attorney Fee	Nate Richards	5/7/2018	1.5	\$200.00	\$300.00	Began analyzing 3rd Motion to Compel. Began Response.
Attorney Fee	Nate Richards	5/7/2018	2	\$200.00	\$400.00	Worked on response to 3rd Motion to Compel
Attorney Fee	Nate Richards	5/7/2018	1.3	\$200.00	\$260.00	Formulated strategy to go forward for Motion to DQ
Attorney Fee	Nate Richards	5/9/2018	0.5	\$200.00	\$100.00	Reviewed Motion for Continuance
Attorney Fee	Nate Richards	5/10/2018	2	\$200.00	\$400.00	Subpoenas for May 25 Hearings
Attorney Fee	Nate Richards	5/10/2018	4.5	\$200.00	\$900.00	Drafted Subpoenas
Attorney Fee	Nate Richards	5/11/2018	1	\$200.00	\$200.00	Reviewed/Revised Subpoenas. Sent to Server.
Attorney Fee	Nate Richards	5/14/2018	0.5	\$200.00	\$100.00	Final review of Chase subpoena. Located and spoke with process server in Harris County. Sent subpoena to serve.

Attorney Fee	Nate Richards	5/16/2018	0.8	\$200.00	\$160.00	Evaluated strategy and procedure for Motion to DQ
Attorney Fee	Nate Richards	5/18/2018	1	\$200.00	\$200.00	Finalized Response to 3rd Motion to Compel
Attorney Fee	Nate Richards	5/22/2018	1.5	\$200.00	\$300.00	Reviewed Plaintiffs' Motion for Continuance. Drafted Response to Motion for Continuance.
Attorney Fee	Nate Richards	5/22/2018	6	\$200.00	\$1,200.00	Prep for Motion to DQ
Attorney Fee	Nate Richards	5/23/2018	4.5	\$200.00	\$900.00	Motion to DQ prep
Attorney Fee	Nate Richards	5/24/2018	2.5	\$200.00	\$500.00	Motion to DQ prep
Attorney Fee	Nate Richards	5/24/2018	6	\$200.00	\$1,200.00	Motion to DQ prep
Attorney Fee	Aaron Vrana	5/25/2018	2.8	\$200.00	\$560.00	attending hearing on motion to disqualify & nbsp;
Attorney Fee	Nate Richards	5/25/2018	3	\$200.00	\$600.00	Prep for Hearing
Attorney Fee	Nate Richards	5/25/2018	3.5	\$200.00	\$700.00	Travel, argued Motion to DQ, travel back.
Attorney Fee	Nate Richards	9/6/2018	0.6	\$200.00	\$120.00	Conferred with Tom on DWQ issue. Researched people and companies we needed included in DWQ. Emailed Discovery Records for the DWQs needed.
Attorney Fee	Nate Richards	9/28/2018	1.7	\$200.00	\$340.00	Reviewed pleadings. Emailed Caleb regarding auditor. Outlined issues with pleadings Caleb has set for hearing.
Attorney Fee	Nate Richards	10/3/2018	1.5	\$200.00	\$300.00	Drafted No Evidence MSJ then separated out Breach of Contract issue
Attorney Fee	Nate Richards	10/4/2018	0.3	\$200.00	\$60.00	Contacted court for hearing date. Drafted notice of hearing and filed.
Attorney Fee	Nate Richards	10/8/2018	2	\$200.00	\$400.00	Reviewed file and formulated arguments for reply to objection for jury trial. Began drafting reply.
Attorney Fee	Nate Richards	10/19/2018	7	\$200.00	\$1,400.00	Hearing Prep for the 4 motions set by Caleb. Travel to Court. Conducted hearing, Travel back. Attorney-client conference.

Attorney Fee	Nate Richards	10/19/2018	1.5	\$200.00	\$300.00	Finalized petition and included partition. Filed in Wise county and obtained citations.
Attorney Fee	Nate Richards	11/2/2018	1	\$200.00	\$200.00	Reviewed DWQ responses from Gongloff.
Attorney Fee	Nate Richards	11/6/2018	1	\$200.00	\$200.00	Drafted motion for substituted service and order. filed with court.
Attorney Fee	Nate Richards	11/6/2018	6.3	\$200.00	\$1,260.00	Reviewed the documents produced by Gongloff Law Firm
Attorney Fee	Nate Richards	11/8/2018	1.5	\$200.00	\$300.00	Prepped for MSJ Hearing
Attorney Fee	Nate Richards	11/9/2018	2	\$200.00	\$400.00	Attended and conducted MSJ Hearing
Attorney Fee	Nate Richards	11/28/2018	3	\$200.00	\$600.00	Research regarding venue/jurisdiction. Read Answer. Emails with Caleb who is representing Frazier in this case as well.
Attorney Fee	Nate Richards	12/7/2018	3	\$200.00	\$600.00	Amended Petition. Researched and drafted motion for consolidation and response to motion to transfer.
Attorney Fee	Nate Richards	12/12/2018	0.3	\$200.00	\$60.00	Contacted court for hearing date. Drafted and filed Notice of Hearing
Attorney Fee	Nate Richards	12/18/2018	3	\$200.00	\$600.00	Travel to Wise County for hearing, attended hearing, travel back and conferred with Mike.
Attorney Fee	Nate Richards	12/31/2018	2.5	\$200.00	\$500.00	Drafted and filed Response to Continuance, Exhibit List, Witness List, Motion in Limine.
Attorney Fee	Nate Richards	1/3/2019	1.5	\$200.00	\$300.00	Prep for Hearing on 1/4
Attorney Fee	Nate Richards	1/4/2019	3	\$200.00	\$600.00	Prep for hearing, travel to hearing, attendance at hearing
Attorney Fee	Nate Richards	1/4/2019	1.5	\$200.00	\$300.00	Conferred with Mike and Tom regarding strategy. Drafted and emailed Caleb demand letter for IRS Lien
Attorney Fee	Nate Richards	1/7/2019	0.5	\$200.00	\$100.00	Conferred with mike regarding DWQ issue with Caleb and drafted email to Caleb.
Attorney Fee	Nate Richards	1/9/2019	2	\$200.00	\$400.00	Formulating Arguments for Motion for Leave to File 3rd Party Pet. Drafting Motion for Leave.
Attorney Fee	Nate Richards	1/11/2019	2	\$200.00	\$400.00	Final additions and edits of Third Party Petition. Compiled Exhibits.

Attorney Fee	Nate Richards	1/21/2019	1	\$200.00	\$200.00	Final edits to Motion for leave to file 3rd party petition and petition and exhibits
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SUMMARY

	HOURS	AMOUNT
NATE TOTALS	290	\$50,973.25
MIKE TOTALS	39.8	\$11,940.00
AARON TOTALS	2.8	\$560.00
DAVID TOTALS	15.8	\$1,580.00
TOTAL	348.4	\$65,053.25

Invoice

J. Michael Ferguson, P.C.

Attorneys at Law

62 Main Street, Suite 310

Colleyville, Texas 76034

Phone (817) 267-1008, Email: legal@fnalegal.com

Bill To:

Customer Name

Anson Financial, Inc.

For Project

B. Frazier Management, Inc. v. Anson

Attorney	Date Worked	Billable Hours	Work Description
Nate Richards	2/20/2019	0.2	Analysis of email from Opposing counsel and response
Nate Richards	2/20/2019	0.1	Read email from opposing counsel
Nate Richards	2/20/2019	0.3	Analysis of email from OC and response
Nate Richards	2/21/2019	1.5	Prep for hearing on 3rd Party Pet
Nate Richards	2/22/2019	0.5	Conferred with client
Nate Richards	2/22/2019	1.0	Prep for hearing
Nate Richards	2/22/2019	2.0	Travel to hearing, attend hearing, Travel back
Nate Richards	2/22/2019	0.25	Conference with client
Nate Richards	2/23/2019	1.0	Read motion for contempt and analyzed
Nate Richards	2/24/2019	2.0	Analyzed edited and drafted Motion to Disqualify
Nate Richards	2/25/2019	0.25	Called court to set Motion to DQ drafted notice of hearing
Nate Richards	2/25/2019	0.5	Prepare for meeting with CPA
Nate Richards	2/25/2019	0.75	Travel and meeting with CPA
Nate Richards	2/25/2019	0.2	Emails with opposing counsel to confer re: motion for sanctions
Nate Richards	2/25/2019	0.1	Emails with opposing counsel and Court for hearing slot
Nate Richards	2/25/2019	1.5	Conference with client and review of audit materials
Nate Richards	2/26/2019	1.0	Review of new plan from CPA, signed documents and sent over to them in email
Nate Richards	3/7/2019	0.2	Email to opposing counsel re: his attempt at a conference

Attorney	Date Worked	Billable Hours	Work Description
Nate Richards	3/18/2019	0.75	Researched arguments and law for response to motion for contempt
Nate Richards	3/18/2019	2.25	Began Drafting response for motion for contempt
Nate Richards	3/18/2019	0.2	Reviewed designation of experts and emails from OC
Nate Richards	4/2/2019	0.5	Conferred with client
Nate Richards	4/8/2019	0.5	Reviewed scheduling order and disclosures. Sent email to Opposing counsel for conference on motion to strike
Nate Richards	4/15/2019	1.0	Researched and reviewed law regarding derivative claims
Nate Richards	4/16/2019	1.0	Researched and reviewed law regarding presentment of claim
Nate Richards	4/18/2019	0.5	Reviewed and analyzed Ps' Expert Designation
Nate Richards	4/18/2019	1.5	Compiled expert designations and drafted them for the Response to RFD
Nate Richards	4/18/2019	1.0	Reviewed law and argument for Response to RFD, finalized and served Response to RFD
Nate Richards	4/22/2019	0.5	Reviewed counterclaim
Nate Richards	4/23/2019	0.8	Searched for email from Caleb Moore to Kelly Gongloff about 3 year extinguishment and attorney conference
Nate Richards	4/24/2019	3.0	In depth research re: termination and claims
Nate Richards	4/24/2019	1.0	Conferred w/ Tom re: case strategy and status
Nate Richards	4/25/2019	0.5	Filled out mediation questionnaire and sent back to mediator
Nate Richards	4/26/2019	1.0	Review of case law, pull and highlighted
Nate Richards	4/26/2019	1.0	Began formulating arguments for MSJ
Nate Richards	4/27/2019	2.5	Research statute and worked on MSJ
Nate Richards	4/29/2019	1.0	Amended counterclaim and filed
	Total	33.6	

Total Hours: 33.60 hours
Billing Rate: \$200.00/hour
Total Charges This Invoice: \$6720.00

THOMAS A. HERALD, P.C.

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Tom@TAHeraldPC.com

Client: Anson Financial, Inc.

RE: Cause No. 342-288776-16

B. Frazier Management, Inc. formerly known as Frazier Asset Management, Inc. and
Brian H. Frazier v. Anson Financial, Inc. as Successor in Interest to Jentex Financial, Inc.

Attorney	Date Worked	Billable Hours	Work Description
Tom A Herald	4/12/2019	1.2	Work on Motion to Bifurcate
Tom A Herald	4/12/2019	6.8	Work on Motion to Strike, Exclude or in Alternative to Compel
Tom A Herald	4/15/2019	6.2	Work on Motion to Strike and Exclude
Tom A Herald	4/15/2019	4.2	Continued work on Motion to Strike and to Exclude
Tom A Herald	4/15/2019	0.5	Prepare and file Notice of Appearance and Designation of Lead Counsel
Tom A Herald	4/15/2019	0.2	Finalize Motion to Bifurcate
Tom A Herald	4/16/2019	0.2	Email to Caleb Moore re Special Exceptions
Tom A Herald	4/16/2019	0.3	Email exchanges with Caleb Moore re Motion to Strike
Tom A Herald	4/17/2019	0.1	Email exchange with Caleb Moore re Motion to Strike
Tom A Herald	4/18/2019	0.1	Receipt and Review of Conformed Order Granting Motion to Bifurcate
Tom A Herald	4/18/2019	0.4	Review and revise Original Counterclaim
Tom A Herald	4/18/2019	0.3	Review William Spore's report
Tom A Herald	4/19/2019	0.3	Review Mike's Expert Witness Report
Tom A Herald	4/22/2019	0.2	Review Original Counterclaim
Tom A Herald	4/22/2019	6.5	Finalize and file Motion to Strike and Exclude
Tom A Herald	4/23/2019	0.2	Conference with Caleb Moore re Special Exceptions
Tom A Herald	4/23/2019	6.8	Finalize Special Exceptions
Tom A Herald	4/24/2019	0.2	Emails with Caleb Moore re deposition dates
Tom A Herald	4/24/2019	0.4	Minor revisions to Special exceptions and file with the court

Attorney	Date Worked	Billable Hours	Work Description
Tom A Herald	4/24/2019	0.3	Email with Caleb Moore re mediation, expert witness deadlines and the auditor
Tom A Herald	4/24/2019	0.3	Conferences with client
Tom A Herald	4/24/2019	7.3	Review and finalize Original Counterclaim and file same with the court
Tom A Herald	4/25/2019	0.2	Respond to Caleb Moore's email to the auditor
Tom A Herald	4/25/2019	0.1	Contacted the court to set hearings on Special Exceptions and Motion to Strike. The Coordinator is out of the office today, but will be back tomorrow.
Tom A Herald	4/25/2019	0.1	Email from Caleb Moore to the auditor
Tom A Herald	4/26/2019	7.7	Revise and finalize 3rd Amended Answer and file with the court
Tom A Herald	4/29/2019	0.2	Receipt of email from Court Coordinator regarding proposed Orders. Emailed and e-filed proposed Orders
Tom A Herald	4/29/2019	7.5	Prepare 6th Supplemental Responses to Requests for Disclosure
	TOTAL	58.8	

Total Hours	58.8
Billable Rate	\$300.00/hour
Total Charges This Invoice	\$17,640.00